Compost Solutions—Summary of Public Informational Meeting

A public informational meeting was held to discuss and receive comments for the proposed SWFP for Compost Solutions on May 3, 2012, 3:30pm to 5:30 pm at the Carnegie Center in Orland, CA. Below is a summary of the questions and comments received and agency/operator responses to those comments.

Question: Doesn't the existing permit require 6 inches of freeboard on all trucks bringing compost into the facility? Compost falling out of trucks is a current problem at the facility.

LEA: The existing EA Notification permit does not specifically require a 6" freeboard on trucks bringing compost into the facility.

> Note: the individual asking the question later found the 6" freeboard requirement in the 2006 Conditional Use Permit (CUP) for the site. A post meeting review of the *Mitigated Monitoring Program and Conditions of Approval* for the amended CUP finds that Mitigation Measure AQ-1 requires a minimum freeboard of 6", and if fugitive material is found to exit the trucks during transport the truck loads shall be required to be covered. So the 6" freeboard for all loads is a requirement for the site.

Question: Are loads required to be covered?

LEA: The RCSI for the new permit will require the facility to cover all loads of biosolids and sewage that are brought into the facility. Compost regulations do not specifically require loads to be covered like landfill regulations. I will need to check the RCSI to determine if non-biosolids loads will need to be covered.

Operator: the loads of biosolids will be brought to the facility inside fully enclosed vehicles.

> Note: a review of the RCSI found no requirement that loads be covered. However, Mitigation Measure MFS-5 of the *Mitigated Monitoring Program and Conditions of Approval* from the amended CUP requires all biosolids loads to be covered. The LEA will consider a permit condition requiring biosolids loads to be covered.

Question: What assurances do we have that there will be no windblown contamination from pathogens? Do you do microbial testing?

LEA: There should not be any windblown contamination because: 1) the loads will be covered, 2) the biosolids composting will take place inside an enclosure, and 3) the diseases related to human waste are not airborne diseases. The site will be required to perform microbial testing of the finished compost as per Cal Recycle regulations. The LEA will specifically require the finished biosolids to be tested at least every other month, and more often if testing shows a problem with pathogen reduction. The LEA will continue to require the operator to test the non-biosolids compost stream once per year, once the annual batch of compost is completed.

Operator: described the process they will use for biosolids in detail.

LEA: further clarified the biosolids composting process (negative aerated static pile, air pulled through biofilter, etc) and further clarified the controls for storm water runoff, pathogen control, and odor control for the proposed process.

Questions pertaining to dust control.

LEA: stated that the EA Conditions section of the permit specifically requires dust control at the site at all times, and that dust control will be enforced during inspections of the facility.

Question: What's to keep the concrete floors (where biosolids will be composted) from cracking?

LEA: A good question. I will consider adding concrete pad maintenance into the SWFP as a permit condition.

Chuck Cutshall: At the facility I run Environmental regulations are very strict, and the cost of failure to comply is extremely high. It is in our best interests, as operators of the project, to guarantee that there will be no groundwater contamination issues. The pad is carefully engineered to prevent ground water contamination, with the soil beneath specially layered & compacted to control potential ground water contamination issues should the concrete pad become compromised. Scott will be engineering his facility in a similar fashion, for similar reasons.

Chuck Cutshall spoke.
He explained what is currently done with sewage pumped from the tanks in the county (land application) and the environmental hazards associated with the current practice, and that the project originated out of a desire to put together a cost effective and environmentally friendly solution to disposal of septic tank pumping.

He gave a detailed explanation processing polymer dewatering process for sewage on his end prior to the sewage cake being brought into the facility, and explained that the sewage cake is regularly tested for a wide range of contaminants well beyond what is required by EPA 503 rule regulations.

He explained that they would be testing for slab leakage on a regular basis. He described the trucks that would be hauling the material and showed a picture of them, to demonstrate that the trucks are fully enclosed and will not drop material onto the roads while driving to the facility.

He brought a sample of the dewatered sewage cake and allowed meeting attendees to view & smell the material.

Question: What are the testing limits for pathogens? Will compost be free of pathogens when the process is complete? How do they test?

LEA: The testing limits for pathogens are those required by the EPA 503 Rule and Cal Recycle composting regulations, which were written to mirror the EPA rule but are more stringent. There

are limits for several heavy metals, Total Coliforms, and Salmonella. Pathogen testing uses an MPN test, which is a statistical microbiological test to determine the number of organisms in a sample.

The EPA 503 rule was based upon the lowest detectable levels when the rule was written in 1993. Testing methods may have improved since then. Biosolids that meet the EPA 503 standard are called *Class A biosolids* and are approved for unrestricted use. *Class B biosolids* are biosolids that have been treated to a lesser degree; their use are restricted to certain applications. While Class A level treatment does not guarantee all pathogens are eliminated, compost that meets this standard is considered essentially free of pathogens.

Public: one attendee commented that testing methods have improved since the EPA 503 rule was written. Also, many attendees continued to express concern over the fact that treatment does not guarantee all pathogens are gone. The LEA replied, stating that requiring compost to be 100% free of pathogens is not a reasonable standard, but experience over the years has shown that residual pathogens that might remain in Class A biosolids do not pose a public health hazard to users.

Question: how many truck trips are approved for the site? What about road maintenance?

LEA: CEQA analysis for the site found the site and local roads can accommodate 208 vehicle trips per day. Note that the CEQA did not consider employee and customer traffic, but 208 vehicle trips is the number that CEQA for the site generated. Therefore, the 208 trips must include employee traffic and customer traffic.

Realistically, the site will probably never receive 208 trips in a day. Typical traffic should be 10-15 vehicles per day on most days, and 50-60 during the busy season when manure and agricultural material is being received.

The amended CUP requires the facility to reimburse the county roughly $4 per 100 tons of material exported from the site to pay for road repair. Whether or not this is enough money remains to be seen, but it is a requirement in the CUP.

Public: asked when the busy season is. The operator stated, "right now" (i.e. spring).

Attendees stated that the facility generates a lot more traffic than they claim to. The LEA responded that several types of business—such as dairies—also use the road, which the public acknowledged.

Several attendees stated that the road is in poor condition. The LEA sympathized with their concern and stated he was aware of the poor road conditions from his own driving trips to the site. One attendee asked if the road repair money would be earmarked for County Road 27. The LEA stated no, the money will go into the general fund. However, the LEA also stated that "the squeaky wheel gets the grease" and informed attendees they had the right to contact Public Works, let them know of road problems as they arise, and remind Public Works that repairs to Road 27 are funded by this project.

Question: how will odor be controlled?

LEA: the LEA reiterated the odor controls in the proposed negative aerated static pile process, that air would be pulled into the pile and run through a biofilter and that the pile would be covered and is required by the compost regulations to have a 6" layer of insulating material. The LEA stated that all compost facilities are required to have an Odor Impact Management Plan (OIMP) in place. The LEA stated that, due to the fact that what might be a foul odor to one person can be perfectly fine to

another, odor is a largely complaint driven process and that the public can help control odor by lodging a complaint with either the operator or LEA when foul odors arise.

The LEA stated that he would be attending Cal Recycle training on odor within the next two months, that means for objectively measuring odor are currently in the process of development, and that the answer to this question could be very different within the next few years.

Comment: more on the road and potholes…

The LEA continued to address road issues, which were a great concern to many of the attendees.

Question: please describe the permit process. Also, when was the CUP amended? Did they notify the public for the CUP amendment?

LEA: the LEA described the 30-60-60-5 day SWFP process for Cal Recycle, including: detailed description of the 30 days to accept/reject the permit package, 60 days to hold a public meeting and prepare the permit package for submittal to the state, 60 days for Cal Recycle to concur/deny the permit, and 5 days to issue permit once the concurred with. Nevin Yeates of Cal Recycle added clarification on Cal Recycle's part of the process pertaining to his review of the permit application, the staff meeting, and the public meetings.

The LEA explained that the CUP was amended in September 2011. The LEA stated that the public was notified of the CUP hearings through the newspaper and via letters sent to all property owners within 300 feet of the site for hearings held in 2010 and 2011. The LEA stated that verification of public notification of hearings for both the CUP amendment process and SWFP permit process where on file at the LEA's office.

Public: asked about rejected SWFP applications. The LEA responded that Compost Solutions' permit application had been rejected twice. When asked on what grounds, the LEA responded that the first time was due to not having CEQA and conformance finding complete (including an explanation of what the IWMP and NDFE are), and the second time due to errors in the RCSI and OIMP.

Question (directed to Marc Sulik of City of Chico): Why are you bringing biosolids to Glenn County? Why not handle them in Butte County?

Mr. Sulik: stated there is no facility that can deal with biosolids in Butte County.

LEA: clarified based upon previous experience working as LEA in Butte County, stating that "facility vision" contributed to the decision to bring biosolids to Glenn County. In Butte County, there are two composting facilities. One is Chico Greenwaste, which Waste Management runs largely as a favor to the City of Chico to provide a place to take green material from municipal collection. The other is the Earthworm Soil Factory, which has a specific goal making earthworm casings and does not want Biosolids as part of their operation. Compost Solutions, on the other hand, is in the business of compost in general and the biosolids represent both a potential source of income and an opportunity to economically deal with an ever-present environmental issue. The composting of biosolids is compatible with the vision of the company.

Questions & comments: some attendees expressed concerns about the maximum amounts of material of biosolids and agricultural waste allowed at the site, and that the site already has trouble managing their current amounts of material. Also that the facility could increase biosolids processing by a simple change to the RCSI thus avoiding public input.

LEA: stated that the maximum amount of material allowable at the site is locked into both the SWFP and the CUP, and that the facility would have to go through the entire process, including public meetings, to change those maximums. The LEA also stated that in response to the Kirby's written comment that biosolids tonnages could be increased too easily, tonnage maximums specifically for biosolids have been added into the permit. An annual maximum for biosolids was added to ensure the amount could not increase without public comment, and a monthly maximum for biosolids was added to ensure the facility would not accidentally become overwhelmed with more material than it could process in the bunkers.

The LEA discussed limits in both tonnage and cubic yards, and the rational for having tonnage limits for material going in and out the gate versus cubic yards for maximum material onsite at any given time.

The LEA stated that the maximum amount of material that could be onsite at any given time was self-limiting by virtue of the size of the facility. The LEA stated that the facility typically had approximately 40,000 cubic yards of compost onsite during recent inspections, and that the facility is probably operating at over half of maximum capacity. As a result of space limitations, the LEA stated that he doubts the facility would ever reach 100,000 cubic yards of material onsite given there probably would not be enough space to store the material, and if the material is stored anywhere other than within the permitted boundary, a violation would be issued and enforcement action would be taken.

Questions were asked pertaining to the composting process.

Mr. Foster: provided clarification on the compost process, describing the pathogen reduction process times for windrow versus aerated static pile composting. Mr. Foster stated that he is required to test for pathogens at the end of the composting process to verify that pathogen reduction has been completed.

LEA: offered clarifications regarding where material will be composted within the facility.

Question (directed to the LEA): would you be comfortable living across the street from a facility composting biosolids?

LEA: the LEA responded that done correctly, he would be comfortable with it. He further stated that the biosolids do not represent any greater risk of disease that the cow and/or chicken manure that is already composted at the site. The LEA clarified, stating that animal manures commonly contain Salmonella, E. coli, Lysteria, and other pathogenic organisms. The LEA continued, stating that many of the pathogens of concern in humans—Cholera, Typhoid, Shigella—are largely controlled in modern society and that animal manure might represent a larger risk than human waste. The LEA offered a clarification related to Shigella, stating that while Shigella is a current public health problem, it's more related to food & swimming pools in recent years than to poor sewage management.

Operator: stated that many of the controls in place for the biosolids were as much to address the stigma of handling human waste as they are to control health hazards.

Questions were asked pertaining to storm water runoff.

Mr. Foster: the biosolids operation would have a tank for collecting leachate, not the pond as originally planned. He further stated that because the biosolids bunkers would be covered, they do not anticipate any storm water runoff from the process.

LEA: stated to the attendees and Mr. Foster that this change in plans would require an RCSI amendment, as would any significant change to the operation that did not otherwise require a permit revision.

The LEA further clarified storm water runoff patterns from the site, that the site is graded to drain to the southeast corner filter strip. Attendees stated that the facility does not always drain that way, expressing concern that water could drain off into a pond located at the north, northeast, and east sides of the facility. The LEA stated that during the rainy season that the facility definitely drains to the southeast corner as seen from observable ponding during storms. The LEA further stated that the facility would have to ensure that this ponding does not continue after the SWFP is issued, as ponding of water onsite would violate the amended CUP and SWFP and would be addressed as a violation.

Concerns were raised about storm water drainage across County Road 27. The LEA stated that this should not happen because the road is raised several feet relative to the facility property. The LEA stated that if this continues to be a problem in to the future, that they should contact the RWQCB to lodge a complaint.

Several attendees expressed frustration that they felt they had not been adequately informed of the CEQA and CUP hearings so that they could have more participation in the decision on whether or not to allow the facility to compost biosolids.

End of meeting.